Dr. Barbara Shane
NTP Office of Liaison, Policy and Review
National Institute of Environmental Health Sciences
P.O. Box 12233
MD A3-01
Research Triangle Park, NC 27709

RE: FR 73-78364 Notice, (Styrene)

Delivered by email on 6 February 2009

Dear Dr. Shane:

The International Institute of Synthetic Rubber Producers, Inc. (IISRP) is a trade association representing the interest of the global synthetic rubber industry. We have many members in the United States and other regions of the world which will be impacted by the NTP's listing of styrene in the 12th RoC. The IISRP has sponsored and published many of the epidemiology research reports cited in the NTP draft background document. We therefore have much experience with the SBR worker cohort as we have been tracking this group of current and former employees in this industry since the late 1970's. This important research continues today.

We submitted both written and oral testimony to NTP's expert panel in July 2008. In addition we have reviewed the study by Boffeta et.al[1] in conjunction with our July comments. The findings by Boffeta parallel our previous comments in that the listing of styrene in the 12 RoC is not supported by the epidemiology evidence. Boffeta et.al conclude "The available epidemiology evidence does not support a causal relationship between styrene exposure and any type of human cancer." We therefore strongly belive that NTP's Draft Substance Profile for Styrene does not an reflect an accurate, complete, or balanced assessment of the human data on styrene, nor does it acknowledge contrary conclusions by other reviewers such as the highly-regarded authors of Boffetta et al.

IISRP also concurs with earlier comments by the Styrene Information and Research Center (i.e. – October 23, 2008 SIRC letter in 12th RoC docket) that highlight NTP's lack of full and accurate assessment of the animal data – which continues to be reflected in the scientifically deficient Draft Substance Profile. We agree with SIRC's opinion that a full review of the animal data provides only limited evidence of carcinogenicity, and that the extensive available mode of

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Epidemiological Studies of Styrene and Cancer: A review of the Literature, December 9, 2008, Boffetta, P. (International Agency for Research on Cancer, Lyon, France; Vanderbilt University, Nashville, Tennessee), Adami, HO (Department of Epidemiology, Harvard School of Public Health, Boston, Massachusetts), Cole, P.(School of Public Health, University of Alabama, Birmingham, Alabama) Trichopoulos, D., Department of Epidemiology, Harvard School of Public Health, Boston, Massachusetts), and Mandel, J.S.(Dalla Lana School of Public Health, University of Toronto, Toronto, Ontario.

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action data indicate that tumors in styrene-exposed mice are not relevant to human health concerns.

Thank you for allowing IISRP the opportunity to provide our comments and we are prepared to respond to any specific questions raised by our comments.

Sincerely,

James L. McGraw
Managing Director and CEO
IISRP

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